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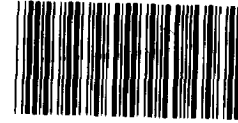
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RELEASED

B-201726

MARCH 4, 1981

The Honorable James T. Broyhill
Ranking Minority Member
Committee on Energy and Commerce
House of Representatives



114869

The Honorable Matthew J. Rinaldo
House of Representatives

Subject: [Review of Programs for Reimbursement
for Public Participation in Federal
Rulemaking Proceedings] (PAD-81-30)

In a September 15, 1980, letter, you requested that we evaluate the manner in which Executive Order 12044 has been implemented with respect to reimbursing witnesses in administrative proceedings. Specifically, you asked to know "which agencies of government have established programs and how much money has been distributed through these programs." (The letter is reproduced in enclosure I.)

Executive Order 12044, entitled "Improving Government Regulations," contains among its provisions a section on public participation in agency rulemaking. Section 2(c), "Opportunity for Public Participation," states that

Agencies shall give the public an early and meaningful opportunity to participate in the development of agency regulations. They shall consider a variety of ways to provide this opportunity, including (1) publishing an advance notice of proposed rulemaking; (2) holding open conferences or public hearings; (3) sending notices of proposed regulations to publications likely to be read by those affected; and (4) notifying interested parties directly.

(972114)

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Agencies shall give the public at least 60 days to comment on proposed significant regulations. In the few instances where agencies determine this is not possible, the regulation shall be accompanied by a brief statement of the reasons for a shorter time period. (Exec. Order No. 12044, 43 Fed. Reg. 12,661 (1978))

Although this Executive Order encourages public participation programs, it contains no specific funding element. It neither requires nor encourages agencies to provide financial support to intervenors.

A subsequent order--Executive Order 12160, "Enhancement and Coordination of Federal Consumer Programs"--established a Consumer Affairs Council with representatives from what were then the 12 Executive Departments. According to sections 1-401(a) and (b), agencies are to have identifiable and accessible staffs to facilitate consumer participation (Exec. Order No. 12160, 44 Fed. Reg. 55,787 (1979)), but the Order does not encourage them to provide funds for intervenors in rulemaking proceedings, although they are not prohibited from doing so.

Public participation reimbursement programs currently proceed under other authority--either specific statute or implied authority. We have collected information on these programs in the 36 executive and independent agencies constituting the U.S. Regulatory Council, an interagency group that includes all the major regulatory agencies.

Six agencies currently operate programs to reimburse public participants in Federal rulemaking proceedings--Consumer Product Safety Commission (CPSC), Environmental Protection Agency (EPA), Food and Drug Administration (FDA), Federal Deposit Insurance Corporation (FDIC), Federal Trade Commission (FTC), and the Department of Agriculture (USDA). Two others--Civil Aeronautics Board (CAB) and National Highway Transportation Safety Administration (NHTSA)--have discontinued their programs. Yet another agency, the Federal Energy Regulatory Commission (FERC), was authorized to provide monetary compensation, but funds were never appropriated for this purpose. A total of \$421,691 was reimbursed in fiscal year 1979, and a total of \$74,263 was reimbursed in fiscal year 1980.

OBJECTIVES, SCOPE, AND METHODOLOGY

In this report, we list the regulatory agencies that have reimbursed citizens for the cost of participating in agency proceedings, the individuals and groups who received

the funds, and the amounts they were paid. As arranged with your office, we did not assess the effects or efficiency of these programs.

We sought initial information on the programs from the Federal Register, which lists the public participation activity for each of the 36 Regulatory Council agencies and summarizes their programs to reimburse participants in agency proceedings. (45 Fed. Reg. 37,133 (1980)) We then contacted the agencies that have funding programs, and they provided us with descriptions of their programs, lists of recipients, and the amounts of the reimbursement outlays for fiscal years 1979 and 1980--the period following Executive Order 12044.

We also researched and report on the legal authority for agency reimbursement programs. The data that follow show our findings in this sequence: agencies with express statutory authority, agencies with implicit authority, and agencies that have no program.

As requested by your office, in the interest of time we did not obtain agency comments.

AGENCIES THAT HAVE AUTHORITY
TO REIMBURSE PARTICIPANTS

Express statutory authority

Statutes specifically authorize four agencies to provide funds to public participants in agency proceedings. These are the Federal Trade Commission, the Environmental Protection Agency, the Consumer Product Safety Commission, and the Federal Energy Regulatory Commission. We present each in turn.

The Federal Trade Commission, under the Magnuson-Moss Warranty-Federal Trade Commission Improvement Act,

may, pursuant to rules prescribed by it, provide compensation for reasonable attorneys fees, expert witness fees, and other costs of participating in a rulemaking proceeding under this section to any person (A) who has, or represents, an interest (i) which would not otherwise be adequately represented in such proceeding, and (ii) representation of which is necessary for a fair determination of the rulemaking proceeding taken as a whole, and (B) who is unable effectively to participate in such proceeding because such person cannot afford to pay costs of making oral presentations, con-

ducting cross-examination, and making rebuttal submissions in such proceeding. (15 U.S.C. 57a(h))

The Environmental Protection Agency, under the Toxic Substances Control Act (15 U.S.C. 2605(c)(4)(A)), has authorization similar to that of the FTC for reimbursing participants. The EPA established a pilot program, but only one reimbursement, in 1977, has been made to date. The EPA is contemplating expanding the pilot program.

The Consumer Product Safety Commission, under the Consumer Product Safety Act (15 U.S.C. 2056(d)(2)), may reimburse any person who participates in the development of a consumer product safety standard if the Commission determines that the participation is likely to result in a more satisfactory standard than would be developed without it. The Commission must also determine that the person is financially responsible.

Implied authority--decisions
of the Comptroller General

A number of regulatory agencies have requested the Comptroller General to decide whether appropriated funds may be used to reimburse public participants in agency proceedings in the absence of specific statutory authorization to do so. We have held consistently that disbursing appropriated funds for this purpose is permissible in certain circumstances. Specifically, we have held that the following agencies have authority to fund public participants:

- Federal Trade Commission, B-139703, July 24, 1972
- Nuclear Regulatory Commission, B-92288, February 19, 1976; January 25, 1980; 59 Comp. Gen. 228 (1980)
- Environmental Protection Agency, B-180224, May 10, 1976; 59 Comp. Gen. 424 (1980)
- Federal Power Commission, Interstate Commerce Commission, Consumer Product Safety Commission, Securities and Exchange Commission, and National Highway Traffic Safety Administration, B-180224, May 10, 1976
- Food and Drug Administration, B-180224, May 10, 1976; 56 Comp. Gen. 111 (1976)
- Economic Regulatory Administration, EMD-78-11, B-192213, October 2, 1978
- Federal Communications Commission, B-180224, May 10, 1976; B-139703, September 22, 1976

The agencies affected by the decisions concerning the Nuclear Regulatory Commission and Economic Regulatory Administration were later prohibited by statute from compensating participants, as we show elsewhere in the report (see p. 8).

We have stated the rationale for these decisions as follows:

While 31 U.S.C. 628 (1970) prohibits agencies from using appropriated funds except for the purposes for which the appropriation was made, we have long held that where an appropriation is made for a particular object, purpose, or program, it is available for expenses which are reasonably necessary and proper or incidental to the execution of the object, purpose or program for which the appropriation was made, except as to expenditures in contravention of law or for some purpose for which other appropriations are made specifically available. (B-92288, February 19, 1976, supra, at 3)

We have stated consistently that it is within the particular agency's discretion to determine whether reimbursement of participants is necessary in accomplishing its functions. (B-139703, September 22, 1976, supra) Initially, we required that, as a prerequisite to its determination, the agency find that the participation is "essential to dispose of the matter before it" (B-92288, supra, at 4) and that the "lack of financial resources on the part of the person involved would preclude participation without reimbursement" (B-139703, September 22, 1976, supra, at 3).

Subsequently, we clarified the first of these two requirements, noting that

While our decision to NRC [B-92288, February 19, 1976, supra] did refer to participation being "essential," we did not intend to imply that participation must be absolutely indispensable. We would agree * * * that it would be sufficient if an agency determines that a particular expenditure for participation "can reasonably be expected to contribute substantially to a full and fair determination of" the issues before it, even though the expenditure may not be "essential" in the sense that the issues cannot be decided at all without such participation.
* * * (56 Comp. Gen., supra, at 113)

Additionally, we recently amplified the second requirement:

We believe that assistance should be extended only to those individuals and organizations which cannot afford to participate without this assistance. An agency should consider the income and expense statements, as well as the net assets, of applicants for assistance. If the agency concludes that the applicant has insufficient resources to participate in the proceeding, it may use appropriated funds to offset the applicant's costs in whole or in part.

On the other hand, the mere fact that the participant would have to choose among alternative activities and could not, for example, participate both in a rulemaking proceeding of EPA and an adjudication by another agency, or lobbying activities in the Congress, does not mean that that party needs financial assistance in order to participate. In such instances, we would expect the participant to choose which public activities are most significant and to use its own resources to participate in those activities. (59 Comp. Gen. 424, supra, at 426)

At least one Federal court has not totally agreed with our view that an agency may, in certain circumstances, reimburse participants without specific statutory authority. In Greene County Planning Board v. Federal Power Commission, the Second Circuit concluded that the Federal Power Commission (FPC) has no authority to reimburse petitioners for the cost of appearing before the Commission to oppose construction of a power line. (559 F.2d 1227 (2d Cir. 1977), cert. denied, 424 U.S. 1086 (1978)) We had previously held, as we note above, that the FPC has implicit authority to reimburse public participants. We noted that

Although the Greene County case cast some doubt on the validity of our previous decisions, it is our opinion that the court decision applied only to the former Federal Power Commission (FPC), and does not apply broadly to other Federal agencies or even to the agencies which succeeded to the FPC's responsibilities. (59 Comp. Gen. 228, supra, at 230)

The District Court of the United States for the District of Columbia (Chamber of Commerce v. United States Department of Agriculture, 459 F. Supp. 216 (D.C. Cir. 1978)) and the

Office of Legal Counsel of the Department of Justice (see 59 Comp. Gen. 228, supra, at 230) have similarly concluded that the Greene County decision did not extend generally to all Federal agencies.

Responding to recurring questions about an agency's authority to reimburse public participants, we have recommended that it would be preferable to undertake such programs under the authority of legislation, if the Congress so desired:

we believe it would be advisable for the parameters of such financial assistance, and the scope and limitations on the use of appropriated funds for this purpose to be fully set forth by the Congress in legislation, as was done in the case of the FTC by the "Magnuson-Moss Act." * * * (B-92288, February 19, 1976, supra, at 8)

Other authority

Three agencies have programs for reimbursement under authority other than specific statute. The Department of Agriculture has promulgated a regulation permitting reimbursement to participants who can show that their contribution is significant to the proceeding and that they are financially needy. (45 Fed. Reg. 6024 (1980)) The Board of Directors of the Federal Deposit Insurance Corporation reviews petitions for reimbursement case by case. The Food and Drug Administration began a pilot program on October 25, 1979, in which applicants must show that the information they will provide is necessary to the proceeding and that they cannot afford to present testimony without aid; an Evaluation Board reviews the applications.

AGENCIES THAT HAVE NO PROGRAMS

Programs currently being established

Two agencies are in the process of establishing programs. These are the National Telecommunications and Information Administration in the Department of Commerce and the Federal Communications Commission.

Programs discontinued or prohibited

The following five agencies have no public participation reimbursement program either because their appropriation acts have expressly prohibited them from engaging in programs or because committee reports accompanying their appropriations indicated a congressional intent that their programs not be continued.

The Economic Regulatory Administration in the Department of Energy (DOE) was specifically prohibited from reimbursing intervenors by the Department of the Interior and Related Agencies Appropriation Act of 1979. (Pub. L. No. 95-465, 92 Stat. 1295 (1978))

The Federal Energy Regulatory Commission was prohibited from establishing a program by DOE's fiscal year 1980 appropriation. (Pub. L. No. 96-69, 93 Stat. 441 (1979))

The Civil Aeronautics Board had a 9 month program that began in January 1979. The National Highway Transportation Safety Administration had begun a program in 1977. Both of these programs were terminated after the conference committee report accompanying the fiscal year 1980 appropriations for these agencies directed that no funds should be allocated for these programs. (H.R. Rep. No. 610, 96th Cong., 1st Sess. (1979))

The Nuclear Regulatory Commission, in its budget request for fiscal year 1981, asked for funds to provide reimbursement to litigants in agency proceedings. However, its 1981 appropriation act prohibited the NRC from paying the expenses of intervenors or otherwise compensating them. (Energy and Water Development Appropriation Act of 1981, Pub. L. No. 96-367, 94 Stat. 1345) We have held recently that this prohibition also prevents the NRC from providing free transcripts and copying and from serving documents without charge, contrary to what the NRC had planned to do. (B-200585, December 3, 1980)

Programs never established

In addition to agencies expressly prohibited from establishing programs, the following Federal Departments and agencies have no programs for reimbursing public participants.

Administrative Conference of the United States
Commodity Futures Trading Commission
Department of the Interior
Department of Housing and Urban Development
Department of Justice
Department of Labor
Department of the Treasury
Equal Employment Opportunity Commission
Federal Election Commission
Federal Home Loan Bank Board
Federal Maritime Commission
Federal Reserve System
General Services Administration
Interstate Commerce Commission

National Credit Union Administration
 National Labor Relations Board
 Occupational Safety and Health Review Commission
 Postal Rate Commission
 Securities and Exchange Commission
 Small Business Administration
 United States International Trade Commission
 Veterans Administration

AMOUNTS REIMBURSED TO PUBLIC PARTICIPANTS

The following schedule shows the amounts that agencies that have programs or that have discontinued their programs reimbursed participants in fiscal years 1979 and 1980.

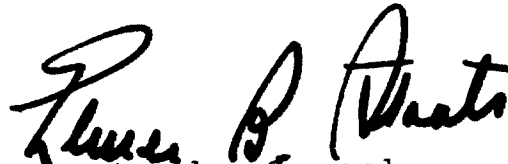
		<u>FY 1979</u>	<u>FY 1980</u>
<u>Statutory programs</u>			
CPSC	Consumer Product Safety Commission	\$ 1,000	\$25,033
EPA	Environmental Protection Agency	0	0
FERC	Federal Energy Regulatory Commission	0	0
FTC	Federal Trade Commission	309,034	42,015
 <u>Other programs</u>			
FDA	Food and Drug Administration	0	7,215
FDIC	Federal Deposit Insurance Corp.	0	0
USDA	Department of Agriculture	0	0
 <u>Discontinued programs</u>			
CAB	Civil Aeronautics Board	23,298	0
NHTSA	National Highway Transportation Safety Administration	<u>88,359</u>	<u>0</u>
TOTAL		\$421,691	\$74,263

Enclosure II lists the individual recipients of these amounts by agency and gives the portion of the total each received.

B-201726

As arranged with your office, unless you publicly announce the contents earlier, no further distribution of this report will be made until 30 days after the report date. At that time, we will send copies to interested parties and make copies available to others upon request.

If you have any questions or if there is further information we can provide you, please let us know.


Comptroller General
of the United States

Enclosures - 2

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Congress of the United States
House of Representatives
 Committee on Interstate and Foreign Commerce
 Room 2125, Rayburn House Office Building
 Washington, D.C. 20515

September 15, 1980

KENNETH J. PAINTER,
CHIEF CLERK AND STAFF DIRECTOR

Honorable Elmer B. Staats
 Comptroller General of the
 United States
 General Accounting Office Bldg.
 Washington, D. C. 20548

Dear Mr. Staats:

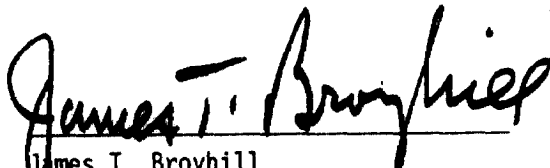
In 1978 President Carter issued Executive Order 12044. In that Executive Order and in a subsequent implementing memorandum, affected Federal agencies were encouraged to establish programs to reimburse certain participants in agency proceedings.

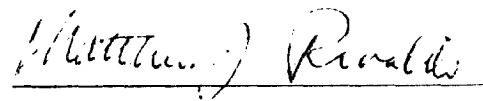
As you know, the question of whether tax dollars should be used to reimburse witnesses in an administrative proceeding was a controversial one during the 96th Congress and promises to generate considerable debate in the 97th Congress. This is especially true for members of the Committee on Interstate and Foreign Commerce since that Committee has jurisdiction over a substantial number of agencies and departments.

Therefore, we would like GAO to evaluate the manner in which the reimbursement funding aspect of Executive Order 12044 has been implemented. Specifically, we would like to know which agencies of government have established programs and how much money has been distributed through these programs.

We hope that you will be able to give this request your prompt attention.

Sincerely yours,


 James T. Broyhill
 Ranking Minority Member,
 Interstate and Foreign Commerce
 Committee


 Matthew J. Rinaldo
 Ranking Minority Member,
 Consumer Protection and Finance
 Subcommittee

REIMBURSEMENTS TO PARTICIPANTS
IN FEDERAL RULEMAKING

Nine Federal agencies have had programs to reimburse public participants in agency proceedings; two of these programs have been discontinued. Of the nine agencies that have or that have had programs, five made reimbursements in fiscal year 1979, fiscal year 1980, or both. The following is a list of groups and people who received funds through the programs, the amounts they received, and the proceeding for which they were paid the funds.

CIVIL AERONAUTICS BOARD

<u>Proceeding</u>	<u>Recipient</u>	<u>Amount Received</u> <u>FY 1979</u>
International Air Transport Assn.	Aviation Consumer Action Project	\$ 8,072.00
Nondiscrimination on the Basis of Handicap	Disability Rights Center	5,725.00
Do.	Rehabilitation International U.S.A.	<u>9,501.28</u>
TOTAL FY 1979		\$23,298.28

CONSUMER PRODUCT SAFETY COMMISSION

<u>Proceeding</u>	<u>Recipient</u>	<u>Amount Received</u> <u>FY 1979</u>
Power Mowers Public Hearing 12/11/78	Sevart, John B.	\$ 310.97
Uphol. Furn. Public Meeting 12/20/78	O'Rourke, Marilyn	<u>689.06</u>
TOTAL FY 1979		\$1,000.03

<u>Proceeding</u>	<u>Recipient</u>	<u>Amount Received</u> <u>FY 1980</u>
Consumer Products Containing Asbestos	Center for Occupational Hazards	\$ 2,486.54
Do.	Environmental Defense Fund	1,810.53
Do.	National Consumers League	1,082.00

(Consumer Product Safety Commission)

<u>Proceeding</u>	<u>Recipient</u>	<u>Amount Received</u> <u>FY 1980</u>
Pub. Play. Equip.	Butwinick, Elayne	\$ 2,606.07
Do.	Childhood Friends (Caesar, Eliz.)	1,275.88
Do.	Co. Safety Assn. (Iverson, Mary Lou)	525.00
Do.	Frost, Joe L.	1,300.00
Do.	Moore, Edward W.	375.00
Do.	Na. Recreation and Park Assn. (Lancaster, Roger)	1,000.00
4 Do.	Werner, Peter	460.00
U.F. Foam Insulation Pub. Hearing	Allan, G. Graham	124.20
Do.	Barth, Donald	161.00
Do.	Brown, Mr. and Mrs. Robert H.	61.69
Do.	Center for Auto Safety (Bezdek, Barbara)	2,366.70
Do.	Center for Pub. Rep. (Goldberg, Mel)	689.49
Do.	Clay, Mr. and Mrs. Michael	595.11

ENCLOSURE II

ENCLOSURE II

(Consumer Product Safety Commission)

<u>Proceeding</u>	<u>Recipient</u>	<u>Amount Received</u> <u>FY 1980</u>
Do.	Co. Attorney General's Office (Stevenson, David J.)	\$ 302.42
Do.	Fox, Michael C.	185.08
Do.	Geller, Mr. and Mrs. Jack	60.71
Do.	Gerdes, M.D., Kendall A.	467.80
Do.	Greene, Thomas	154.98
Do.	Johnson, Gertrude	126.85
Do.	Jonas, Elmer S.	273.85
5 Do.	Jozefcayk, Mr. and Mrs. Stan	104.86
Do.	Keeney, Mr. and Mrs. Michael	38.30
Do.	Kelley, Paula B.	55.95
Do.	Kubinski, Henry A.	407.15
Do.	Lavigna, Michael P.	263.94
Do.	McGlew, Rev. Robert F.	52.04
Do.	Manker, Bruce C.	77.69
Do.	Miller, Helen E.	87.14
Do.	Mobile Home Owners of America, Inc. (Jenson, E.D., John)	119.13

ENCLOSURE II

ENCLOSURE II

(Consumer Product Safety Commission)

<u>Proceeding</u>	<u>Recipient</u>	<u>Amount Received</u> <u>FY 1980</u>
Do.	Myer, Carl B.	\$ 245.90
Do.	National Consumers League (Swankin, David)	3,248.65
Do.	Nievar, Mr. and Mrs. M. J.	322.20
Do.	Schultheis, Walter F.	169.45
Do.	Schwend, Glenn	193.78
Do.	Smock, Fay L.	142.84
Do.	Smrecek, Connie	191.32
Do.	Sprague, David C.	172.93
Do.	S.U.F.F.E.R. (Patterson, Stephen A.)	95.61
Do.	Whittington, Mr. and Mrs. Thomas	329.82
Do.	Wiley, Ray A.	48.12
Do.	WI Dept. of Health & Social Services (Woodbury, Mary Ann)	<u>175.50</u>
TOTAL FY 1980		\$25,033.32

ENCLOSURE II

ENCLOSURE II

FEDERAL TRADE COMMISSION

<u>Proceeding</u>	<u>Recipient</u>	<u>Amount Received</u> <u>FY 1979</u>
Antacids	California Citizen Action Group	\$ 3,813.75
Do.	Consumer Affairs Committee; Greater Washington Chapter; Americans for Democratic Action; National Council of Senior Citizens/Council on Children, Media and Merchandising	560.00
Do.	Council on Children, Media and Merchandising	2,562.49
Do.	National Council of Senior Citizens/Consumer Affairs Committee, ADA	10,363.34
Care Label	National Consumers League	1,596.00
Do.	Taylor, Ruth Arleen	504.57
Children's	Action for Children's Television/ Center for Sciences in the Public Interest	31,843.83
Do.	Center for Public Representation	472.58
Do.	Committee for Children's TV/ Consumers Union	36,225.73
Do.	Community Nutrition Institute	33,368.00

ENCLOSURE II

ENCLOSURE II

(Federal Trade Commission)

<u>Proceeding</u>	<u>Recipient</u>	<u>Amount Received</u> <u>FY 1979</u>
Do.	Council on Children, Media and Merchandising	\$ 22,724.52
Do.	Geis, Michael	181.66
Do.	Wachman, Daniel	325.00
Do.	Ward, Scott	224.00
Do.	Wartella, Ellen	165.28
Food Adver.	Council on Children, Media and Merchandising	1,406.98
∞ Funerals	California Citizen Action Group	1,656.25
Do.	Cremation Assn. of North America	3,996.50
Do.	National Council of Senior Citizens/Consumer Affairs Committee, ADA	5,750.90
Do.	New York Public Interest Research Group	429.30
Do.	Pre-Arrangement Interment Assn.	4,641.50
Over the Counter Drugs	California Citizen Action Group	3,352.00
Do.	Consumer Affairs Committee, Greater Washington Chapter, Americans for Democratic Action	3,752.85

ENCLOSURE II

ENCLOSURE II

(Federal Trade Commission)

<u>Proceeding</u>	<u>Recipient</u>	<u>Amount Received</u> <u>FY 1979</u>
R-Value	National Assn. of Home Insulation Contractors	\$ 4,053.77
Do.	National Consumers League	1,847.37
Standards	American Council of Independent Laboratories, Inc.	26,403.81
Do.	American Federation of Small Business	776.54
Do.	Art Hazards Project (Center for Occupational Hazards)	7,665.02
Do.	Artists Equity Assn.	2,618.05
Do.	Center for Auto Safety	6,099.78
Do.	Center for Public Representation	9,505.21
Do.	Chanter, Warren J.	198.10
Do.	Council of Vietnam Veterans	3,527.96
Do.	Electronic Specialists, Inc.	552.17
Do.	Fitzgerald Management Corp.	1,725.86
Do.	Hayward, John O.	1,650.33
Do.	Min-Ell Co.	1,149.05
Do.	National Consumers League	35,605.78

ENCLOSURE II

ENCLOSURE II

(Federal Trade Commission)

<u>Proceeding</u>	<u>Recipient</u>	<u>Amount Received</u> <u>FY 1979</u>
Do.	Public Interest Economics Foundation	\$ 4,345.00
Do.	Ream, Norman J.	2,210.34
Do.	SAS Corp.	259.50
Do.	SEMA Foundation, Inc.	10,844.34
Do.	Union of Concerned Scientists	4,837.60
Used Cars	Automobile Owners Action Council	4,848.13
10 Do.	California Public Interest Research Group/San Francisco Consumer Action	3,542.54
Do.	Center for Auto Safety	<u>4,849.59</u>
TOTAL FY 1979		\$309,033.77

<u>Proceeding</u>	<u>Recipient</u>	<u>Amount Received</u> <u>FY 1980</u>
Children's	Consumers Union/Committee for Children's TV	\$ 1,410.35
Hearing Aids	National Council of Senior Citizens	3,060.00
Do.	National Hearing Aid Society	3,062.24

ENCLOSURE II

ENCLOSURE II

(Federal Trade Commission)

<u>Proceeding</u>	<u>Recipient</u>	<u>Amount Received FY 1980</u>
Mobile Homes	Center for Auto Safety	\$ 1,920.00
Standards	Center for Auto Safety	3,128.66
Do.	Hayward, John O.	1,318.59
Do.	National Consumers League	18,516.00
Used Cars	Automobile Owners Action Council	5,771.00
Do.	California Public Interest Research Group/San Francisco Consumer Action	<u>3,828.33</u>
		\$42,015.17
TOTAL FY 1980		

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FOOD AND DRUG ADMINISTRATION

<u>Proceeding</u>	<u>Recipient</u>	<u>Amount Received FY 1980</u>
Board of Inquiry, on Aspartame	Olney, Dr. John W.	\$6,905.00
Infant Formula	Snyder, Barbara	<u>310.00</u>
TOTAL FY 1980		\$7,215.00

NATIONAL HIGHWAY TRANSPORTATION SAFETY ADMINISTRATION

<u>Proceeding</u>	<u>Recipient</u>	<u>Amount Received</u> <u>FY 1980</u>
Child Restraint Systems	Action for Child Transportation	\$ 1,775.00
Consumer Information Regulation	Center for Auto Safety	3,609.10
Established Fuel Economy Standards, 1981-84 Passenger Cars	Environmental Defense Fund	694.45
Five-Year Plan for Motor Vehicle Safety and Fuel Economy Rulemaking	Center for Auto Safety	6,003.74
NI Federal Bumper Standard	Automobile Owners Action Council	2,640.00
Fuel System Integrity-- Plastic Fuel Tanks	Hayward, John O.	1,485.50
Interim Occupant Protection in Light Trucks	Center for Auto Safety	3,073.55
Public Meeting on Child Transportation Safety	Automobile Owners Action Council	11,693.90
Do.	Hayward, John O.	1,322.65
Do.	Jewett, Jean	2,321.85
Do.	Seattle Consumers Action Council	14,251.00

ENCLOSURE II

ENCLOSURE II

(972114)

(National Highway Transportation Safety Administration)

ENCLOSURE II

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<u>Proceeding</u>	<u>Recipient</u>	<u>Amount Received</u> <u>FY 1980</u>
Do.	All others <u>a/</u>	\$17,822.35
Public Meeting on Heavy Duty Truck Safety	Dulki, Don	609.84
Do.	Hasfond, Martin T.	654.78
Do.	Professional Drivers Council	2,230.00
Do.	Teamsters Union Local 741	695.54
Do.	All others <u>b/</u>	10,438.02
Revise Light Truck Average Fuel Economy Standards Model Year 1981	Automobile Owners Action Council	1,866.00
Do.	Center for Auto Safety	2,500.60
Rulemaking Proceeding on Side Door Strength	Center for Auto Safety	<u>2,691.60</u>
TOTAL FY 1980		\$88,359.47

ENCLOSURE II

a/Other groups and individuals totalling 45 received less than \$1,000.00 each.

b/Other groups and individuals totalling 32 received less than \$600.00 each.

